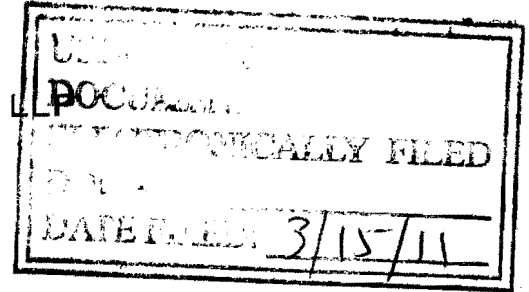


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By Facsimile & FCM

Hon. Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street, Room 1050
New York, NY 10007

March 11, 2011

*The motion to withdraw
if not effected on the client's
consent, shall be heard and
determined by Hon. J. C. Frowne,
USM 3/15/11*
Ch/Th

Re: Karimian v. Time Equities, Inc., et. al.; 10 cv 3773 (AKH)

Dear Judge Hellerstein:

I represent plaintiff Bijan Karimian in the above-captioned action. In light of ongoing issues with my client, I need to make an application to withdraw as counsel of record for plaintiff.

The facts that will support my application for withdrawal are of a very sensitive nature and I have a strong concern that prejudice to plaintiff's case may occur should such reasons be exposed to opposing counsel or your Honor as the presiding judge. As such, I write to request that my application be heard by another Judge or Magistrate Judge in the Southern District of New York who is unconnected to the matter. In addition, I write to request permission to be allowed to file my application in paper form directly with the Judge instead of through ECF so that it can be considered in confidence without risk of exposure to opposing counsel.

Please note that I have not copied opposing counsel on this letter due to the sensitive nature of the matter, and given the fact that the issues do not directly involve the defendants or opposing counsel. If my decision not to copy my adversary was in error please let me know and I will immediately send a copy of this letter to opposing counsel to rectify such error.

Respectfully submitted,

Himmel & Bernstein, LLP

By: 

Tracey S. Bernstein

TSB/oho

cc: Plaintiff Bijan Karimian (via Email)